



in this case, which includes claims of racial discrimination by four plaintiffs alleging a variety of discriminatory actions, Defendant was unable to serve this material until July 13, 2018.

3. The parties have met and conferred regarding the timing of Plaintiffs' response to Defendant's letter, and to provide any revisions to Defendant's proposed Joint Statement of Facts.

4. Should it please the Court, the parties have agreed that the following schedule will allow the parties to come to a final version of the Joint Statement of Facts and to meet and confer regarding Defendant's letter prior to the filing of Defendant's dispositive motion:

- a. Plaintiffs will provide any additions and/or revisions to Defendant's proposed Joint Statement of Facts by July 30, 2018;
- b. Per the Court's standing order on Summary Judgment, Plaintiffs will also advise Defendant of factual matter or legal authority that they believe would defeat Defendant's contemplated Motion for Summary Judgment by July 30, 2018;
- c. Defendant will respond to any contested revisions to the Joint Statement of Facts on or before August 6, 2017;
- d. Defendant will file the final Joint Statement of Facts and its Motion for Summary Judgement with the Court on or before August 13, 2018.

5. Accordingly, Defendant moves the Court to extend its deadlines regarding Defendant's dispositive motion by 28 days, as follows:

- a. Defendant shall file his dispositive motion on or before August 13, 2018;
- b. Plaintiffs shall file their response on or before September 27, 2018;
- c. Defendant shall file his reply on or before October 11, 2018.

6. Defendant contacted Plaintiff's counsel, who indicated that he has no objection to such an extension.

7. This motion is brought in good faith and not for the purposes of delay, and neither party will be prejudiced by the granting of this motion.

WHEREFORE, Defendant CHIEF JUDGE OF THE CIRCUIT COURT OF COOK COUNTY, requests an extension of time of the dispositive motion briefing schedule by 28 days; and for such further relief as the Court finds reasonable and just.

Respectfully Submitted,

July 16, 2018

LISA MADIGAN  
Illinois Attorney General

/s/ Jeffrey Freeman  
JEFFREY FREEMAN  
Office of the Attorney General  
100 West Randolph Street, 13th Floor  
Chicago, IL 60601  
P: (312) 814-4451  
F: (312) 814-4425  
[jfreeman@atg.state.il.us](mailto:jfreeman@atg.state.il.us)